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August 9, 2023

VIA ECF

Hon. Cathy L. Waldor, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Sun Chemical Corporation v. American Home Assurance Company, et al.
Civil Action No. 2:20-cv-6252 (SRC-CLW)

Dear Judge Waldor:

This firm represents Plaintiff, Sun Chemical Corporation, in the above-captioned matter. We write with a joint request with counsel for Defendants American Home Assurance Company and National Union Fire Insurance Company of Pittsburgh, PA, in its own right and as successor-in-interest to Landmark Insurance Company ("Defendants"). We also want to update the Court on the status of this matter.

First, the parties both request an additional 30 days, or until September 11, 2023, to respond to outstanding discovery requests to allow the parties to focus on the second issue set forth below.

Second, Sun Chemical has requested the consent of the Defendants to add two additional litigation matters (now pending in the Superior Court of New Jersey) to this action. Sun Chemical has an answer due in the second of these matters on August 30, 2023. The first, in which no discovery has proceeded, has been ordered to mediation (which has not yet occurred). The parties have met and conferred concerning the possible amendment, by consent, to the complaint, provided this Court is in agreement. Counsel for the Defendants has requested a redline of the proposed pleading before providing their consent. We will have a redline prepared and circulated shortly for their review and approval. After that we anticipate presenting it to the Court well before the next case management conference.

In order for Sun Chemical and Defendants to focus on the possible pleading amendment, rather than discovery responses, we request the extension until September 11, 2023 to provide responses to outstanding discovery. We look forward to providing a status update on all of these efforts at the September 11th conference.



Norris McLaughlin, P.A.

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Thank you.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Martha N. Donovan", is written over a horizontal line.

Martha N. Donovan

MND/pd

cc: All counsel of record via ECF